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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DAVID MELVIN and J.L., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

23ANDME, INC.,

Defendant.

CASE NO. 3:23-cv-05234

Hon. Edward M. Chen

**DECLARATION OF REBEKAH S. GUYON
IN SUPPORT OF DEFENDANT 23ANDME,
INC.'S ADMINISTRATIVE MOTION TO
CONTINUE DEADLINE TO RESPOND TO
COMPLAINT UNTIL AFTER CASE
MANAGEMENT CONFERENCE
PURSUANT TO LR 7-11**

DECLARATION OF REBEKAH S. GUYON

I, Rebekah S. Guyon, declare:

1. I am an attorney licensed to practice law in California and before this Court and a shareholder with the law firm of Greenberg Traurig, LLP, counsel of record for Defendant 23andMe, Inc. (“Defendant” or “23andMe”) in this action. This declaration is based on my personal knowledge, and if called upon to do so, I could and would testify competently thereto under oath.

2. On January 31, 2024, 23andMe and plaintiffs’ counsel, who advised me that they represented all Related Actions filed to date with the exception of counsel for Plaintiffs in *Melvin*, participated in a mediation in good faith to attempt resolve the pending litigation.

3. From late January 2024 until as recently as February 9, 2024, I, and other members of 23andMe’s counsel, have attempted to meet and confer with counsel for plaintiffs across all Related Cases regarding a schedule for the Related Cases and whether plaintiffs would extend 23andMe’s deadline to respond to the complaints until after the initial case management conference (“CMC”).

4. Counsel for plaintiffs in the following Related Cases have since informed me that they agree to continue 23andMe’s deadline to respond to the complaint until 30 days after the CMC: *Santana v. 23andMe, Inc.*, 3:23-cv-05147; *Andrizzi v. 23andMe, Inc.*, 3:23-cv-5198; *Greenberg v. 23andMe Inc.* 3:23-cv-5302; *Hoffman v. 23andMe Inc.*, 5:23-cv-5332; *Fralix v. 23andMe, Inc.*, 3:23-cv-05439; *Velez v. 23andMe, Inc.*, 3:23-cv-05464; *Alperstein v. 23andMe, Inc.*, 3:23-cv-5541; *Smith v. 23andMe, Inc.*, 3:23-cv-05548; *Furia v. 23andMe Inc.*, 3:23-cv-05565; *Schutz v. 23andMe, Inc.*, 3:23-cv-05579; *Ioffe v. 23andMe, Inc.*, 3:23-cv-06205; *Vickery v. 23andMe, Inc.*, 3:23-cv-05635; *Navarro v. 23andMe, Inc.*, 3:23-cv-05281; *Mirza v. 23andMe, Inc.*, 3:23cv5259; *Dube v. 23andMe, Inc.*, 3:23-cv-05768; *Sorensen v. 23andMe, Inc.*, 3:23-cv-05677; *Friend v. 23andMe, Inc.* 3:23-cv-05323; *Doe v. 23andMe, Inc.*, 3:23-cv-05717; *Seikel v. 23andMe, Inc.* 3:23-cv-05419; *Eden v. 23andMe, Inc.*, 3:23-cv-05200; *Molina v. 23andMe, Inc.*, 3:23-cv-05779; *Farmer v. 23andMe, Inc.*, 3:23-cv-05341; *Scott v. 23andMe Holding Co., 23andMe, Inc.* 3:23-cv-05980; *Rivers v. 23Andme, Inc., 23Andme Holding Co.*, 3:23-cv-06481; *Ryan v. 23andMe, Inc.*, 3:23-cv-5968; *Picha v. 23andMe, Inc.*, 5:23-cv-06719; *MacMillan v. 23andMe, Inc.* 3:24-cv-00555.

1 5. Counsel for plaintiffs in the following Related Case has not informed me of their position
2 on 23andMe's requested continuance of its deadline to respond to the complaint as of the filing of this
3 motion: *Paddy v. 23andMe Inc.*, 3:23-cv-06698.

4 6. On February 1, 2024, the same day this Court related *Melvin* to *Santana* and reassigned
5 *Melvin* to this Court, I, and other members of 23andMe's counsel, began contacting Plaintiffs' counsel to
6 request Plaintiffs agree to continue 23andMe's deadline to respond to the complaint until 30 days after the
7 CMC, to align with the Related Cases. As of February 12, 2024, counsel for Plaintiffs in this matter have
8 not yet advised 23andMe if Plaintiffs will stipulate to extend Defendant's deadline to respond to the
9 complaint or oppose a motion to continue the deadline.

10 I swear under penalty of perjury under the laws of the United States of America that the foregoing
11 is true and correct to the best of my knowledge and that this Declaration was executed on February 12,
12 2024, in Los Angeles, California.

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14 /s/ Rebekah S. Guyon
15 REBEKAH S. GUYON
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